

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION

LEDA HEALTH CORPORATION and MADISON
CAMPBELL,

Plaintiffs,

- against -

MICHELLE HENRY, in her official capacity as Attorney
General of Pennsylvania, and LETTIA JAMES, in her
official capacity as Attorney General of New York,

Defendants.

Civ. Action No. 24-879 (CB)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that defendant Attorney General Letitia James (“Attorney General James”) moves this Court for an Order dismissing with prejudice all claims against Attorney General James in the Complaint in the above-captioned action filed on June 17, 2024 (ECF #1), pursuant to Federal Rule of Civil Procedure 12(b)(1), (2), (3), and (6) for lack of subject matter jurisdiction, lack of personal jurisdiction, improper venue, and failure to state a claim on which relief can be granted.

PLEASE TAKE FURTHER NOTICE, that in support of her motion, Attorney General James shall rely upon the Memorandum of Law in Support of Her Motion to Dismiss, dated July 30, 2024; the Declaration of Laura J. Levine, dated July 30, 2024, and the exhibits attached thereto; the Complaint; and all other pleadings and papers submitted in this action.

PLEASE TAKE FURTHER NOTICE, that pursuant to this Court’s Practices and Procedures, any opposition papers to Attorney General James’s motion are due to be served on or before August 19, 2024; and Attorney General James’s reply papers, if any, are due to be served on or before August 26, 2024.

PLEASE TAKE FURTHER NOTICE that, on July 30, 2024, Attorney General James will file a motion for an Order modifying the Court's July 2, 2024 Scheduling Order to adjourn the hearing on Plaintiff's motion for a preliminary injunction or, in the alternative, to expedite a ruling on Attorney General's James's jurisdictional arguments in her motion to dismiss; and thus, the above briefing schedule is subject to any Court Order on Attorney General James's motion for an expedited ruling.

PLEASE TAKE FURTHER NOTICE that, in the event that Attorney General James's motion to dismiss is denied, Attorney General James requests thirty (30) days from the date of such Order to answer the Complaint.

Dated: New York, New York
July 30, 2024

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